



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
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BOSTON, MASSACHUSETTS 02114-2023

February 28, 2002

Lonnie Monaco (monacolj@exchange.efdnorth.northdiv.navy.mil)
Engineering Field Activity Northeast, Naval Facilities Engineering Command
Code 1821/LM
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

**Re: Draft Proposed Remedial Action Plan (PRAP) for Site7 at Naval Air Station
Brunswick, Maine**

Dear Mr. Monaco:

Thank you for the opportunity to review the above document; EPA's specific comments are attached. Our comments were few relative to other PRAPs and we appreciate the Navy's quick turnaround of the draft PRAP.

As earlier discussed, the final groundwater and soil investigation (removal) report should be in the administrative record and available to the public at the start of the PRAP public review and comment period. EPA is pleased to confirm that all our comments to the draft report (by letter dated 11/13/2001) were satisfactorily resolved in your response to comments, sent by EA, Inc by email on 2/20/2002.

Our other substantive comment is that 5-year reviews need to be described as a remedy component since waste will remain in place in the form of groundwater contaminated with cadmium above the MCL/MEG (for a time at least). We expect/recommend the PRAP to anticipate this to be a temporary situation due to the site specific conditions.

For any questions, please contact me at 617.918.1344 or barry.michael@epa.gov.

Sincerely,


Michael S. Barry
Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc. Ed Benedikt/Brunswick Conservation Commission (rbenedik@gwi.net)
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Attachment
US EPA Comments to Draft Proposed Remedial Action Plan
Site 7 (OU7) Naval Air Station, Brunswick, ME

Note: Comments added to the preliminary comments sent on 2/15/2002 are in bold. Others are identical except for editorial changes.

1. Page 1, Introduction.
 - a. Need to add the 5 year review to the remedy description (can caveat with requirement expected to end within 10 years or at least at some point).
 - b. Also, please consider using a box w/remedial component bullets as was done with site 9 as it's easier to read.
 - c. It's understood why "Limited" LTM is described; i.e. to convey a small, short duration program. However, this is covered well on page 5 and "Limited" has no regulatory meaning and may be ambiguous to the reader - would you consider deleting it?
2. Page 2-figure. Please consider including all the test pits/borings/wells/removal area information, etc. Adding this information would show that:
 - a. This SMALL area has been very well studied, thus there is good reason to feel all the source material is removed, i.e. this will address the question "how do you know it's so limited, and if so why don't we cite further excavation as an alternative?"
 - b. This would graphically relate a lot of the investigation results/history - and maybe cut required text.
 - c. This could make the figure a bit busy, however if a full page is allotted to the figure, it may be readable. Perhaps there will be room for box of the key results?
 - d. The Institutional Control (IC) boundary should also be included in the figure. Note that the IC boundary as depicted in figure 4 of NASBINST 5090.1B appears to be accurately designated, but is from a general map. A site 7 specific figure will be needed for the ROD and the NASBINST figure should be updated at the next routine revision.
3. Page 3, Proposed RA. In the 4th bullet we prefer to cite the actual cadmium and MCL concentrations.
4. Page 3-4, Summary of Remedial Investigations. The PRAP should state what the conclusion of the 1990 RI/FS was and why was further action taken in 2000? As written, it jumps from no threat on the 1985 study to the fieldwork performed in 1988-89 for the RI/FS to further work in 2000 with no explanation.
 - a. EPA speculates that all sites identified in the 1980's preliminary assessments were included in the 1990 RI/FS unless all concurred that they were of no concern.
 - b. Per EPA's understanding, the FS recommended no further action (NFA) due to limited,

shallow cadmium contamination (in only one well on the order of 15 ppb; MCL-5 ppb) and the lack of an exposure pathway for ingestion. Shortly after this (circa early 1990's) the MEGs were promulgated, thus triggering action as an applicable or relevant and appropriate regulation (ARAR). This should be briefly related in the PRAP (or exactly what did happen):

- c. Recommend you consolidate the 1988 and 1989 field work activities for brevity.
 - d. On the Initial Assessment, recommend deleting the "NACIP" acronym for brevity; "confirmation" study" should suffice - or define what NACIP stands for.
 - e. Cadmium results of the RI and the 2001 Phase II work should be stated for key wells/test pits/excavations in a brief table - or could be put with the figure on page 2.
5. Page 4, end of "Summary of Investigations" Section.
- a. Usually a "Summary of Site Risks" section follows at this point in the PRAP. Including the cadmium results vs the MCL/MEG as commented above will sufficiently address the omission of a summary site risks section for this PRAP.
 - b. **Suggest adding the following: "Based upon the results of this removal, the Navy has determined that further excavation is not feasible."**
6. Page 4 Summary of Remedial Alternatives. A. The first part of the section is really the RAO's (Remedial Action Objectives) and should have a separate header. Also, because the MEGs are an ARAR, aquifer restoration should be an RAO.
7. Page 5, Alternative 2 .
- a. Need to add a 5 year review to the table and text. Suggest a caveat that the groundwater contamination is expected to clear up in the near to mid term time frame. There is no need to add a 5 year review to the alternative title, however.
 - b. In components on the table and in text, we prefer "control" or "restrict" for excavation since you can excavate at the site under proper Health & Safety planning and disposal, etc. Also prefer "...pumping and use of groundwater" to "installation of drinking water wells". This covers all groundwater uses and actually gives the Navy more flexibility.
 - c. Prefer to state the MCL/MEGs rather than the general "criteria"
 - d. Should add a bit more detail on what the IC's are as in the site 9 PRAP - basically NASB Operating Instructions, etc. Also need to add the paragraph about will occur to guarantee IC's in event the property is transferred - see site 9 PRAP.
 - e. Ceasing of groundwater monitoring should be noted as being with review and approval by MEDEP/EPA.
8. Page 6, The Navy's Proposed Remedy.
- a. Need to add 5 year reviews as a remedy component.

- b. **Need to add in the last paragraph that the remedy does not meet the statutory preference for active treatment, though it will permanently reduce concentrations. An example of text that would meet this objective is: "An irreversible reduction in the toxicity and volume of contamination will occur as a result of this alternative's reliance upon natural attenuation processes. However, natural attenuation is not considered active treatment, and an alternative that relies upon natural attenuation processes does not meet the statutory preference for treatment under CERCLA." The above reads like formal, legalistic language more appropriate to the ROD than the PRAP; EPA would consider a proposal for more "public friendly" wording that would convey the same idea.**
9. Page 6, Table 2.
- a. The title of Alternative 2 should be same as on page 5. EPA also prefers "groundwater monitoring" to "Natural Attenuation" in the title. Use of "Natural Attenuation" implies triggering the Monitored Natural Attenuation (MNA) Guidance to the regulator community. Normally, a MNA remedy requires a detailed MNA study which includes a calculation of expected decay rates, etc. This could be confusing and ambiguous to some reviewers as an MNA study wasn't done for site 7 - nor would EPA advocate one.
- b. CERCLA criteria 3. This criteria refers to after RAO's are met, thus it seems both alternatives should rate more similarly, as in criteria 2.
10. Page 7. References. The 10/2001 draft summary report should be finalized, see cover letter.